

THELEN REID BROWN
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Hearing Date: February 15, 2007 at 10:00 a.m.
Objection Deadline: February 8, 2007 at 4:00 p.m.

Attorneys for Brandes Investment Partners, L.P.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DELPHI CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

**NOTICE OF MOTION OF BRANDES INVESTMENT PARTNERS, L.P. FOR ENTRY
OF AN ORDER APPROVING SPECIFIED INFORMATION BLOCKING
PROCEDURES AND PERMITTING TRADING OF DEBTORS'
BONDS UPON ESTABLISHMENT OF A SCREENING WALL**

PLEASE TAKE NOTICE that Brandes Investment Partners, L.P. (“Brandes”), a member of the Committee of Equity Security Holders (the “Committee”) in the chapter 11 cases of the above-captioned debtors (collectively, “Debtors” or “Delphi”), has filed a motion, a copy of which is annexed hereto (the “Motion”), seeking an order, pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), approving information blocking procedures and permitting trading in the Debtors’ corporate Bonds (as defined in the Motion) in certain situations.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must: (a) be made in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the

Local Rules for the United States Bankruptcy Court for the Southern District of New York, and the Amended Eighth Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered on October 26, 2006 (the “Amended Eighth Supplemental Case Management Order”) (Docket No. 5418), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court’s case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon counsel to Brandes, Thelen Reid Brown Raysman & Steiner LLP, 875 Third Avenue, New York, New York 10022 (Att’n: Daniel A. Lowenthal), and the following: (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att’n: General Counsel), (ii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Att’n: John Wm. Butler, Jr.), (iii) counsel to the agent under the Debtors’ prepetition credit facility, Simpson Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Att’n: Kenneth S. Ziman), (iv) counsel to the agent under the postpetition credit facility, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017 (Att’n: Marlane Melican), (v) counsel to the Official Committee of Unsecured Creditors, Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022 (Att’n: Robert J. Rosenberg and Mark A. Broude), (vi) counsel to the Official Committee of Equity Security Holders, Fried, Frank, Harris, Shriver & Jacobson LLP, One New York Plaza, New York, New York 10004 (Att’n: Bonnie Steingart), and (vii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New

York 10004 (Att'n: Alicia M. Leonhard), in each case so as to be **received** no later than **4:00 p.m. (Prevailing Eastern Standard Time) on February 8, 2007** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Motion, Brandes will, on or after the Objection Deadline, submit to the Court a final order substantially in the form attached hereto as Exhibit B, which order will be submitted and may be entered with no further notice or opportunity to be heard offered to any party.

PLEASE TAKE FURTHER NOTICE that in the event objections or responses are received by the Objection Deadline, a hearing (the "Hearing") will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, on February 15, 2007 at 10:00 a.m., or as soon thereafter as counsel may be heard, in Courtroom 610, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, to consider the Motion.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or at a later hearing.

Dated: New York, New York
January 26, 2007

Respectfully submitted,

THELEN REID BROWN
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